

Meanith Huon
PO Box 441
Chicago, Illinois 60690
312-405-2789
312-268-7276 FAX No.
Huon.meanith@gmail.com

December 12, 2016

VIA EMAIL, REGULAR MAIL, AND E-FILING

Hon. Judge Stuart M. Bernstein
Courtroom: 723
One Bowling Green
New York, NY 10004-1408

Re: Request to appear via telephonic conference
In re Gawker Media, LLC
Chapter 11
Case No.: 16-11700 (SMB)

Dear Judge Bernstein:

Out of an abundance of caution, I am making the following disclosures under New York Rule 3.3, Conduct before Tribunal, and New York Rule 3.4, Fairness to Opposing Counsel:

I was provided with legal advice and/or information from Charles Harder and the law firm of Harder, Mirell & Abrams LLP in appealing my case against Gawker Media in Huon v. Denton, et. al., Case No.: 15-3049 (7th Circ. 2016.). I was reimbursed for certain of my costs.

I was provided with legal advice and/or information from Charles Harder and Harder's prior firm, the law firm of Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP, in litigating my case against Gawker Media in Huon v. Denton, et. al., Case No.: 11-cv-3054, before the U.S. District Court in the Northern District of Illinois. I was reimbursed for certain of my costs.

I was provided with legal advice and/or information from Michael Kernan, an attorney retained by Charles Harder, in litigating my case against Gawker Media in Huon v. Denton, et. al., Case No.: 11-cv-3054, before the U.S. District Court in the Northern District of Illinois. See attached email correspondence attached as Exhibit "A".

By making these disclosures, I am not waiving the Attorney Client Privilege regarding my communications with the aforesaid attorneys and law firm. Thank you.

Very truly yours,

/s/ Meanith Huon

Meanith Huon

cc: (VIA EMAIL ONLY)
Gregg M. Galardi
Elizabeth Beruit
Jonathan Agudelo
Ropes & Gray, LLP

(VIA EMAIL ONLY)
Mark Tsukerman
Cole Schotz PC

12/11/2016

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Meanith Huon <huon.meanith@gmail.com>

Emails

1 message

Charles Harder <charder@hmafirm.com>

Mon, Oct 31, 2016 at 10:52 AM

To: Meanith Huon <huon.meanith@gmail.com>

Cc: Dilan Esper <DEsper@hmafirm.com>, Douglas Mirell <dmirell@hmafirm.com>

Meanith: Can you please discontinue emails to my firm? It is not necessary for us to receive them, and we would prefer not to receive them. We wish you good luck with your matter. Thank you. –Charles

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Meanith Huon <huon.meanith@gmail.com>

Status

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Sun, Aug 14, 2016 at 1:52 PM

Hi. What is the status of your appeal? I saw that you were dismissed from the BK proceeding. Are you ending the appeal as to Gawker? Thanks

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
(424) 203-1600

Sent from iPhone; please excuse any typos.

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Gmail - Re: Request for reimbursement/Huon v. Gawker

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Meanith Huon <huon.meanith@gmail.com>

Re: Request for reimbursement/Huon v. Gawker

1 message

Charles Harder <charder@hmafirm.com>

Mon, Feb 1, 2016 at 8:24 PM

To: Meanith Huon <huon.meanith@gmail.com>

No problem.

Charles J. Harder
HARDER MIRELL & ABRAMS LLP
132 S. Rodeo Drive, Suite 301
Beverly Hills, CA 90212
(424) 203-1600

Sent from iPhone; please excuse any typos.

> On Feb 1, 2016, at 5:30 PM, Meanith Huon <huon.meanith@gmail.com> wrote:
>
> Hi Charles:
>
> Do you think your client would be willing to reimburse the Fedex cost for copying and binding of 344.30?
>
> If so, please send a check to: Meanith Huon, PO Box 441, Chicago, IL 60690.
>
> Thanks.
>
>

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Meanith Huon <huon.meanith@gmail.com>

Appeal

1 message

Charles Harder <charder@hmafirm.com>

Wed, Dec 10, 2014 at 11:12 PM

To: Meanith Huon <huon.meanith@gmail.com>

I will pay the fee, so feel free to file the notice of appeal. Do you need someone else to be counsel of record at that time? I plan to find someone to write a draft of the appellate brief for you, but would like to have more time than Jan 3 to find the right person. I probably will have someone in my office draft it and then send the draft to an appellate atty in Chicago for them to review and perhaps put their signature on and file, and to argue the case in court. Sound like a plan?

>

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Gmail - Your case

Meanith Huon <huon.meanith@gmail.com>


Your case

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Wed, Dec 11, 2013 at 12:22 PM

Yes, the cavalry is still behind you. We would need to discuss specifics. I would probably retain a contract attorney in Chicago for your case. Any clue when the judge is going to rule on the pending motions?



Charles J. Harder
HARDER MIRELL & ABRAMS LLP
1801 Avenue of the Stars, Suite 1120
Los Angeles, California 90067
www.HMAfirm.com
(424) 203-1600

Sent from my iPhone



Meanith Huon <huon.meanith@gmail.com>

Opposition

1 message

Charles Harder <charder@hmafirm.com>

Wed, Mar 6, 2013 at 4:53 PM

To: "huon.meanith@gmail.com" <huon.meanith@gmail.com>

I have no further comments to the draft that I sent you earlier, so feel free to file as is or further revise as you see fit.

**CHARLES J. HARDER**

1801 AVENUE OF THE STARS

SUITE 1120

LOS ANGELES CA 90067

TEL (424) 203-1600

CHARDER@HMAFIRM.COMwww.HMAFIRM.COM

Editor, *ENTERTAINMENT LITIGATION* (Oxford University Press, 2011)

Listed, *Top 100 "Power Lawyers" in America*, *The Hollywood Reporter*

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Gmail - Huon 2-5-13 Response to Defendant's Motion to Dismiss [with SEL Edits]

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Meanith Huon <huon.meanith@gmail.com>

Huon 2-5-13 Response to Defendant's Motion to Dismiss [with SEL Edits]

1 message

Charles Harder <charder@hmafirm.com>
To: Meanith Huon <huon.meanith@gmail.com>

Sun, Mar 3, 2013 at 3:52 PM

Meanith: Here's the draft we have so far. It's pretty strong. I was going to take one last look at it on Monday and see if there is anything else to include.

>



HUON 2-5-13 Response to Defendant's Motion to Dismiss [with SEL Edits].doc

198K

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Gmail - Gawker's Memo re Mtn to Dismiss

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Meanith Huon <huon.meanith@gmail.com>

Gawker's Memo re Mtn to Dismiss

1 message

Charles Harder <charder@hmafirm.com>

Tue, Jan 22, 2013 at 6:24 PM

To: "huon.meanith@gmail.com" <huon.meanith@gmail.com>

Meanith: Can you please send me a copy of Gawker's Memo of Ps and As supporting its Motion to Dismiss? I can't seem to find a copy of it, and it is not available at Pacer (Dkt 175). Thank you.

CHARLES J. HARDER**HARDER MIRELL & ABRAMS LLP**

1801 AVENUE OF THE STARS

SUITE 1120

LOS ANGELES CA 90067

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CHARDER@HMAFIRM.COMWWW.HMAFIRM.COM

Editor, *ENTERTAINMENT LITIGATION* (Oxford University Press, 2011)

Listed, *Top 100 "Power Lawyers" in America*, *The Hollywood Reporter*

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Gmail **Lawyer's Memo re Mtn to Dismiss** Pg. 11 of 23

Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

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RE: the new york times wrote us up

Meanith Huon <huon.meanith@gmail.com>

RE: the new york times wrote us up

1 message

Douglas Mirell <dmirell@hmafirm.com>

Mon, May 30, 2016 at 2:26 PM

To: "Meanith Huon Esq. (huon.meanith@gmail.com)" <huon.meanith@gmail.com>

Cc: Dilan Esper <DEesper@hmafirm.com>

Meanith,

Note that Drange's article is now out & does not mention your case:

<http://www.forbes.com/sites/mattdrange/2016/05/30/peter-thiel-hulk-hogan-lawyers-charles-harder/print/>

Doug

**DOUGLAS E. MIRELL, ESQ.**

HARDER MIRELL & ABRAMS LLP

132 S. RODEO DRIVE, SUITE 301

BEVERLY HILLS, CA 90212-2406

DIRECT: (424) 203-1603

FAX: (424) 203-1671

CELL: (310) 200-4135

DMIRELL@HMAFIRM.COMWWW.HMAFIRM.COM

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(424) 203-1603

From: Dilan Esper
Sent: Monday, May 30, 2016 8:51 AM
To: Charles Harder; Jeffrey Abrams; Douglas Mirell
Subject: the new york times wrote us up

http://www.nytimes.com/2016/05/30/business/media/gawker-case-calls-attention-to-a-go-to-hollywood-lawyer.html?_r=0

www.HMAFIRM.COM

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E: 14 times wrote us up

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Meanith Huon <huon.meanith@gmail.com>

Huon/Gawker

1 message

Douglas Mirell <dmirell@hmafirm.com>

Thu, Apr 14, 2016 at 11:05 AM

To: "Meanith Huon Esq. (huon.meanith@gmail.com)" <huon.meanith@gmail.com>

Cc: Dilan Esper <DEesper@hmafirm.com>

Dear Meanith,

Are we still expecting to receive the appellees' brief today?

Best regards,

Doug



DOUGLAS E. MIRELL, ESQ.

HARDER MIRELL & ABRAMS LLP

132 S. RODEO DRIVE, SUITE 301

BEVERLY HILLS, CA 90212-2406

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Meanith Huon <huon.meanith@gmail.com>

RE: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

1 message

Dilan Esper <DEsper@hmafim.com>

Thu, Apr 14, 2016 at 3:42 PM

To: Meanith Huon <huon.meanith@gmail.com>, Douglas Mirell <dmirell@hmafim.com>, Charles Harder <charder@hmafim.com>

Meanith:

I will review this and be in touch with you with my thoughts on the reply.

Dilan

From: Meanith Huon [mailto:huon.meanith@gmail.com]**Sent:** Thursday, April 14, 2016 12:12 PM**To:** Douglas Mirell; Dilan Esper; Charles Harder**Subject:** Fwd: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

Here you go. Thanks.

----- Forwarded message -----

From: <CA07_CMECFMail@ca7.uscourts.gov>

Date: Thu, Apr 14, 2016 at 2:05 PM

Subject: 15-3049 Meanith Huon v. Nick Denton, et al "Submit a Brief"

To: huon.meanith@gmail.com

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Seventh Circuit Court of Appeals**Notice of Docket Activity**

The following transaction was entered on 04/14/2016 at 2:05:20 PM CDT and filed on 04/14/2016

Case Name: Meanith Huon v. Nick Denton, et al**Case Number:** [15-3049](#)

12/10/2016

Gmail - RE: 15-3049 Meanith Huon & Nick Denton, et al "Submit a Brief"

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Document(s): [Document\(s\)](#)**Docket Text:**

Submitted appellee brief by CHAD R. BOWMAN for Appellees Nick Denton and Gawker Media. [41] [6743153] [15-3049] (Bowman, Chad)

Notice will be electronically mailed to:

Mr. Meanith Huon, Attorney
Mr. Chad Russell Bowman, Attorney

The following document(s) are associated with this transaction:

Document Description: Submit a Brief

Original Filename: 15-3049, Appellees Brief.pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1105395651 [Date=04/14/2016] [FileNumber=6743153-0] [9b557c11a952ea8e103a32568f98d2a41da52ad186315874e3a72867c1ec97295b96c370f6f19872335c0f9ac5a4ca1b647eebf689eb24c5161ab1c9edb3026b]]

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Gmail - RE: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

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Meanith Huon <huon.meanith@gmail.com>

RE: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

1 message

Dilan Esper <DEsper@hmafirm.com>

Thu, Jan 28, 2016 at 5:36 PM

To: Meanith Huon <huon.meanith@gmail.com>, Charles Harder <charder@hmafirm.com>, Douglas Mirell <dmirell@hmafirm.com>

Congratulations on completing and filing your brief, Meanith. We were happy to be of assistance. We will obviously be in touch when you receive Gawker's response.

From: Meanith Huon [mailto:huon.meanith@gmail.com]**Sent:** Thursday, January 28, 2016 3:33 PM**To:** Charles Harder; Dilan Esper; Douglas Mirell; Meanith Huon**Subject:** Fwd: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

----- Forwarded message -----

From: <CA07_CMECFMail@ca7.uscourts.gov>

Date: Thu, Jan 28, 2016 at 2:20 PM

Subject: 15-3049 Meanith Huon v. Nick Denton, et al "Brief filed"

To: huon.meanith@gmail.com

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Seventh Circuit Court of Appeals**Notice of Docket Activity**

The following transaction was entered on 01/28/2016 at 2:20:23 PM CST and filed on 01/28/2016

Case Name: Meanith Huon v. Nick Denton, et al**Case Number:** [15-3049](#)**Document(s):** [Document\(s\)](#)**Docket Text:**

Appellant's brief filed by Appellant Meanith Huon. Paper copies due on 02/04/2016 Electronically Transmitted. [31] [6724461] [15-3049] (SK)

Notice will be electronically mailed to:

Amy J. Hansen, Attorney

Mr. Meanith Huon, Attorney

The following document(s) are associated with this transaction:

Document Description: Brief filed

Original Filename: 15-3049.pdf

Electronic Document Stamp:

[STAMP acecfStamp_ID=1105395651 [Date=01/28/2016] [FileNumber=6724461-0] [6a50e46213324d1284b4469a122978dd4e2d57be82b74b81c2301a51acfd5a75204ce14adfefcf8d6593dba25e0521a6b7dfe5691221e39734aa65125f460cf]]

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Gmail - Huon - Gawker, Breaking Media

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Meanith Huon <huon.meanith@gmail.com>

Huon - Gawker, Breaking Media

1 message

Charles Harder <charder@wrslawyers.com>

Tue, Sep 18, 2012 at 6:25 PM

To: huon.meanith@gmail.com

Meanith:

Please see the attached corporate documents re Gawker entities and Breaking Media.

My corporate associate, who ordered these documents, states: "Nothing indicates the membership, other than Gaby Darbyshire signing as member or managing member in a couple places, Denton signing as manager in one instance, and each of them signing with corporate officer titles (Pres for Denton, and VP and COO for Darbyshire). We'll see if the California filings say anything substantive ..."

Charles J. Harder, Esq.
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
11400 W. Olympic Blvd., Ninth Floor
Los Angeles, California 90064
(310) 478-4100 x6605
(310) 479-1422 (fax)
E-Mail: CHarder@WRSlawyers.com

Web: www.WRSlawyers.comBio: <http://www.wrslawyers.com/attorneys/charles-harder.asp>

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12/10/2016

Gmail - Hot - Gawker, Breaking Media

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5 attachments



GAWKER SALES, LLC.pdf
163K



GAWKER TECHNOLOGY, LLC.pdf
255K



GAWKER ENTERTAINMENT, LLC.pdf
215K



BREAKING MEDIA, INC..pdf
442K



GAWKER MEDIA LLC.pdf
298K

12/10/2016



Meanith Huon <huon.meanith@gmail.com>

Revised TAC

1 message

Charles Harder <charder@wrslawyers.com>

Fri, Sep 7, 2012 at 7:01 PM

To: huon.meanith@gmail.com

Meanith,

My partner, Les, and I added a few additional edits to the draft TAC. See attached. You can generate a redline using Word, comparing this version with the prior version. Also, please note that the new Gawker defendants are not included in this draft – you would need to add them. I also removed my name and firm's name from the bottom. You will be filing this yourself. We are simply helping you out at this point. If we have the opportunity to take depositions on your behalf, then at that point we could formally associate into the case, with you.

Charles

Charles J. Harder, Esq.
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
11400 W. Olympic Blvd., Ninth Floor
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Web: www.WRSlawyers.comBio: <http://www.wrslawyers.com/attorneys/charles-harder.asp>

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**THIRD AMENDED COMPLAINT.DOCX**

67K

DATE: 12/19/16

Charles W. Harnett, Esq.
1000 W. Olympic Blvd., Suite 1000
Los Angeles, California 90004
(310) 407-0000
charles@chwfirm.com

Re: [REDACTED]

My partner, Paul, and I added a few additional items to the old TAC. As attached. You can generate a redline using Word's comparing tool. I will attach the new version. Also, please note that the new version contains the old version's "to do" list - you would need to add them. I also removed my name and title information from the bottom. You will be filing this with the court. We are only asking you to add the new items. If we have the opportunity to file a deposition or your deposition, we would be happy to discuss the new items with you.

Charles

Charles W. Harnett, Esq.
1000 W. Olympic Blvd., Suite 1000
Los Angeles, California 90004
(310) 407-0000
charles@chwfirm.com

Web: www.chwfirm.com

Paul W. Harnett, Esq. (310) 407-0000 paul@chwfirm.com

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The 1200 Credit and 700 Credit are both being filed as amended by the Trustee. Paul W. Harnett, Esq. (310) 407-0000 paul@chwfirm.com

FILED
U.S. BANKRUPTCY COURT
S.D. N.Y.
DEC 19 P 1:17

THOMAS ANDREO COMPLAINT